

Babbitt did not know of Collier's March 15 meeting with Patrick O'Connor, although Babbitt knew O'Connor from their years in politics.⁴²⁸ Babbitt said he had no recollection of having any contact with lobbyists regarding the Hudson application, other than with Paul Eckstein.

⁴²⁷(...continued)

members at the Hay Adams Hotel. Babbitt recalls attending this DNC dinner, but not the White House political meeting – though Babbitt's counsel told the press in February 1998 that Babbitt was "quite sure that he had no conversation with Ickes or anyone else about the casino issue at that meeting." *Babbitt Attended Political Session Days Before the Initial Decision on Casino*, the New York Times, Feb. 21, 1998, at A8. That article also reported the attendees at the May 15 White House meeting as Babbitt, Collier, Sosnik and Democratic pollster Mark Penn.

In any event, even if Babbitt received on May 15 no information on Ickes's role in the 1996 campaign and the fund-raising needed to support the campaign, there was ample opportunity for Babbitt to gather such knowledge from major media sources prior to July 14. *See, e.g., Clinton, Using Old Hands and New, Slowly Creates a Re-election Team*, the New York Times, Feb. 27, 1995, at B6 (describing Ickes as "the President's political major-domo," and head of the day-to-day campaign effort); *With Drive to Generate Funds, Clinton Reelection Team Prepares to Set Up Shop*, The Washington Post, March 5, 1995, at A6 (reporting that Ickes is overseeing early effort, much of which "is driven by money," and that "fund-raising will drive the outside-the-White House reelection efforts, at least for several months"); *Clinton in '96: The Check Request Is in the Mail; A List of Would-Be GOP Opponents Grows, President Prepares to Open Reelection Office*, The Washington Post, April 14, 1995, at A9 (citing party sources who say Ickes has been "designated to run the campaign from the White House"); *The Traveling Salesman; Clinton Hits Campaign Trail Although He Claims It's Too Early*, The Washington Post, June 11, 1995, at A8 (reporting that Ickes is "overseeing the reelection effort at the White House"); *Bill Clinton's Son of a Gun; Deputy Chief of Staff Harold Ickes Rides Herd On Some Ornerly Critters. Might Say He's One Himself*, The Washington Post, June 22, 1995, at C1 (noting that "Ickes is responsible for organizing the campaign," and quoting Ickes as saying: "The main focus right now is the fund-raising operation . . .").

⁴²⁸Babbitt said he knew O'Connor on a social basis. It is possible they met during the Carter Administration. Babbitt stated that he does not know whether O'Connor raised money for him during Babbitt's 1988 presidential bid, but he probably did. Babbitt recalled meeting with O'Connor at Interior in 1993 in connection with a matter involving Soka University in California. He was not aware that O'Connor had represented anyone in connection with the Hudson matter until the investigation of the decision.